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6 Attorneys for the Jonathon W. Bishop

7 UNITED STATES DISTRICT COURT  
8 EASTERN DISTRICT OF WASHINGTON

9 United States of America,

10 Plaintiff,

11 v.

12 Jonathon W. Bishop,

13 Defendant.

No. 2:20-CR-0051-WFN

Defendant's Motion to Modify  
Conditions of Pretrial Release

August 13, 2021 @ 6:30 p.m.  
Without Oral Argument

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24 Motion to Modify Conditions of Pretrial Release

1 Jonathon Bishop, through counsel, Amy H. Rubin for the Federal Defenders of  
2 Eastern Washington and Idaho, respectfully moves the Court to modify condition No. 14  
3 of his pretrial release:<sup>1</sup>  
4

5 (14) Defendant shall remain in the Eastern District of Washington while the case  
6 is pending. By timely motion clearly stating whether opposing counsel and  
7 Pretrial Services object to the request, Defendant may be permitted to travel  
outside this geographical area.

8 Mr. Bishop request this Court to allow him to leave the Eastern District of  
9 Washington on September 3, 2021. He will be traveling to George, WA with his  
10 stepfather, mother, and mother's boyfriend for the Dave Matthews concert. The  
11 concert will take place on September 3, 2021 at 5:00 pm at the Gorge. He specifically  
12 requests permission to be outside of Eastern District of Washington until 2:00 am  
13 September 4, 2021, as there may be heavy traffic coming back to Spokane from the  
14 venue.<sup>2</sup>  
15

16 Counsel has conferred with Assistant United States Attorney Ann Wick and Ms.  
17 Wick defers to U.S. Probation and the Court. U.S. Probation Emely Cubias, does not  
18 object to this motion.  
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22 <sup>1</sup> See ECF No. 27 at 3

23 <sup>2</sup> USPO Emely Cubias has approved the 9/3/2021 travel request, but condition  
24 #14 in ECF No. 27 requires a motion. See ECF No., 27 at 3.

1 Dated: August 13, 2021

2 Respectfully Submitted,

3 /s/Amy H. Rubin

4 Amy H. Rubin, WA 618349

5 Attorneys for Bishop

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7 Eastern Washington and Idaho

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24 Motion to Modify Conditions of Pretrial Release

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/s/Amy H. Rubin  
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